

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

KELLY BLAND, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

OUR WORLD ENERGY LLC  
AND  
EDJ ENTERPRISES INC.

Defendants.

Case No. 4:24-cv-00994-P

**JURY TRIAL DEMANDED**

**PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY  
IN OPPOSITION TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff respectfully files this Notice of Supplemental Authority in Opposition to Defendant Our World Energy’s Motion To Dismiss. Yesterday, Judge Weilheimer of the United States District Court for the Eastern District of Pennsylvania denied a nearly identical motion to dismiss in one of Plaintiff’s counsel’s other cases, *Murch v. Quest Health Solutions, LLC*, No. 24-5478. A copy of the opinion is enclosed herein as Exhibit A.

The opinion is notable in that it addresses the propriety of the very theory of personal jurisdiction vis-à-vis vicarious liability advanced by the Defendant here, and noted that the factual allegations in that complaint, specifically, that the calls were sent pursuant to the moving defendant’s direction, were sufficient to state a claim at the pleading stage. The Court also noted that the jurisdictional discovery required to establish facts sufficient to allow dismissal on personal jurisdiction grounds were “essentially coterminous with Plaintiff’s theory of liability,” and that it would “not be in the interest of judicial economy to create dual discovery tracks.”

In light of the foregoing authority, the Defendant’s Motion to Dismiss should therefore be denied.

RESPECTFULLY SUBMITTED AND DATED this June 3, 2025.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date.

Dated: June 3, 2025

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
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